

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re:	Case No. 23-13237-pmm
Tri-State Paper, Inc.,	Chapter 11
Debtor.	
Tri-State Paper, Inc.,	Adversary No. 23-00090-pmm
Plaintiff,	
v.	
Monika Ramirez,	
John Does #1-2,	
Defendants.	

Stipulation of Settlement and Dismissal as to Defendant Monika Ramirez

WHEREAS, Plaintiff Tri-State Paper, Inc. filed a second amended complaint on December 12, 2023, alleging that Defendants Monika Ramirez and John Does #1-2 are liable to the Plaintiff for turnover of property, and

WHEREAS, the Plaintiff and Ms. Ramirez (“the parties”) are interested in resolving the issues alleged in the complaint in this action, and have negotiated in good faith for that purpose,

WHEREAS, the parties wish to discontinue this litigation,

WHEREAS, all unrepresented parties are aware that the Plaintiff’s counsel only represents the Plaintiff’s interests and cannot offer legal advice to any defendant in this matter, and

WHEREAS, all unrepresented parties are aware that they may seek legal advice before signing this agreement by requesting a referral from a county bar association using the contact information available at <https://www.paeb.uscourts.gov/finding-attorney>.

NOW, THEREFORE, IT IS STIPULATED by and between the parties and their respective counsel that:

1. All claims for damages by the Plaintiff which are the subject of this action or otherwise arise out of any of the incidents alleged in the complaint are hereby settled against Ms. Ramirez in full satisfaction of all claims for damages, costs, disbursements, and legal fees, in exchange for the following consideration:
 - a. payment by Ms. Ramirez to the Plaintiff in the amount of \$5,000.00, and
 - b. Ms. Ramirez’s full cooperation with all efforts by the Plaintiff in this action and its bankruptcy case to discover the identity of all unidentified co-conspirators involved in the claims which are the subject of this action or otherwise arise out of any of the incidents alleged in the complaint, including but not limited to sitting for a deposition.

2. Ms. Ramirez must send a check, money order, or certified funds in the amount of \$5,000.00 made payable to TRI-STATE PAPER, INC. via certified mail to CIBIK LAW, P.C., 1500 WALNUT STREET, SUITE 900, PHILADELPHIA, PA 19102, on or before January 18, 2024.
3. Ms. Ramirez must send a certified mail tracking number to the Plaintiff's attorney by emailing MAIL@CIBIKLAW.COM promptly after mailing the payment described above.
4. Nothing in this stipulation may be construed as an admission or concession of liability whatsoever by Ms. Ramirez regarding any of the allegations made in the complaint.
5. This stipulation embodies the entire agreement of the parties with respect to this matter.
6. The parties hereby request that the Court enter an order:
 - a. approving this stipulation and dismissing this case as to Ms. Ramirez with prejudice in the form of order below, and
 - b. granting such other and further relief consistent with this stipulation as may be necessary and proper under the law.

CIBIK LAW, P.C.
Counsel for Plaintiff

By: /s/ Michael I. Assad
Michael I. Assad
Attorney ID 330937
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com

/s/ Monika Ramirez
Monika Ramirez
Defendant

Date: December 18, 2023

Date: December 18, 2023

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Order of Dismissal

AND NOW, upon consideration of the Stipulation of Settlement, it is hereby **ORDERED** that:

1. The stipulation is **APPROVED**.
2. All terms of the stipulation are incorporated herein by reference and will form a part of this Order as if set forth in their entirety.
3. This case is **DISMISSED WITH PREJUDICE** as to Defendant Monika Ramirez.

Patricia M. Mayer
U.S. Bankruptcy Judge

CC: Cibik Law, P.C.
1500 Walnut Street, Suite 900
Philadelphia, PA 19102

Monika Ramirez
421 Crane Ave.
Compton, CA 90221